Applicants request favorable reconsideration and allowance of the subject application in view of the preceding amendments and the following remarks.

The claims now pending in the application are claims 1-13, with claims 1, 10, and 13 being independent. By this Amendment, claims 1, 10 and 13 have been amended. Support for the amendments can be found in the original application, as filed. No new matter has been added.

Claims 1-13 stand rejected to under 35 U.S.C. § 112, first paragraph as allegedly failing to disclose "executing a rendering including a process which overwrites foreground data generated in accordance with the common data." Without conceding the propriety of this rejection, claims 1, 10, and 13 have been amended to more clearly define Applicants' invention, thereby obviating this rejection. Support for the amended claim language may be found in the specification at least at page 9, line 25, to page 10, line 7, and at page 11, lines 10-12 and 14-16. Favorable reconsideration and withdrawal of the Section 112 rejection are requested.

Claims 1, 4-6, 10, and 13 stand rejected under 35 U.S.C. § 103 as unpatentable over U.S. Patent No. 6,466,331 (Tai et al.) in view of U.S. Patent No. 6,226,000 (Richens et al.). Additionally, claims 2, 3, 7-9, 11, and 12 stand rejected under 35 U.S.C. § 103 as unpatentable over Tai et al. in view of Richens et al., and further in view of U.S. Patent No. 5,978,563 (Kawamoto et al.). Applicants traverse these rejections.

According to an aspect of Applicants' invention, independent claim 1 relates to an image processing apparatus featuring a plurality of rendering sections and a converter. The plurality of rendering section respectively generate color component images on the basis of data common to the respective color components. Each rendering section executes a rendering including a process which, in accordance with rendering logic, carries

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out an operation of writing foreground data on destination data so as to generate one of the color component images as a red, green, or blue color component image. The foreground data, destination data, and rendering logic are indicated by the common data. The plurality of rendering sections generate data in a pixel unit from the common data which includes at least one rendering object and a rendering position of the rendering object. The converter converts the generated color component images into color component images for printing in synchronism with operation of a printer image.

In other aspects of Applicants' invention, independent claims 10, directed to an image processing method, and 13, directed to a computer-product storing a computer-readable medium having program code for an image processing method, feature steps that generally correspond to the features of independent claim 1. For example, in each of independent claims 1, 10, and 13, a plurality of rendering sections generate data in a pixel unit from the common data which includes at least one rendering object and a rendering position of the rendering object.

Applicants submit that at least such features are not taught or suggested by the cited patents, whether those patents are taken alone or in combination.

Tai et al. relates to multi-bit rendering with single color and two-color capability. In Tai et al., the rendering processors 140 and 150 are understood to input an 8-bit signal from gamma correction processors 120 and 130, and render the input signals into M and N-level signals to generate a 4-bit composite signal, as shown in Figure 3.

Richens et al. relates to interactive image editing, and is understood to be cited for teaching objects located both in a foreground and in a background, with objects overwritten in the foreground and not in the background.

However, neither Tai et al. nor Richens et al. is understood to teach or suggest that a plurality of rendering sections generate data in a pixel unit from the common data which includes at least one rendering object and a rendering position of the rendering

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object, as recited in independent claims 1, 10, and 13. Accordingly, reconsideration and withdrawal of the Section 103 rejection of these claims are requested.

Kawamoto et al. was cited merely for teaching features of dependent claims. That patent is not understood to remedy the deficiencies of Tai et al. and Richens et al., discussed above.

For the foregoing reasons, Applicants submit that independent claims 1, 10, and 13 recite features that patentably define Applicants invention over the cited patents, whether those patents are taken alone or in combination.

The remaining claims depend from one of the independent claims and are believed to be allowable by virtue of that dependency, as well as for reciting other patentable features of Applicants' invention. Independent and favorable reconsideration of the dependent claims are requested

Applicants submit that this application is in condition for allowance. Favorable reconsideration and an early Notice of Allowance are requested..

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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